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July 21, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TWA325
Washington, DC 20554

Re: Reply to Comments Re: ET Docket 13-49, *Potential sharing solutions between proposed Unlicensed National Information Infrastructure (U-NII) devices and Dedicated Short Range Communications (DSRC) operations in the 5.850-5.925 GHz band*

Dear Ms. Dortch,

In addition to comments I submitted on behalf of Peloton Technology on ET Docket No. 13-49 on July 7th, 2016, and after having reviewed the various comments submitted by a wide range of stakeholders, I appreciate the opportunity to highlight two additional issues related to potential sharing solutions between proposed Unlicensed National Information Infrastructure (U-NII) devices and Dedicated Short Range Communications (DSRC) operations in the 5.850-5.925 GHz band. We applaud the thoughtful and detailed comments FCC has gathered during the comment period, and intend this response to help put these comments in the context of the current state and future trajectory of the DSRC-enabled vehicle technology industry.

Commercial Use of DSRC is Happening Now

The extensive comments of the National Cable & Telecommunications Association (NTCA) supporting rechannelization of U-NII-4 include the comment that, “[a]s in the United States, safety-related DSRC has yet to be deployed in the 5.9 GHz band in any meaningful way in other countries.” The assertion that “meaningful” DSRC deployments have not occurred in the U.S. is often prevalent in the public debate around unlicensed use of the 5 GHz U-NII bands. However, Peloton has trucks on the road today using DSRC to enable Driver-Assistive Truck Platooning (DATP) applications and is on track to commercialize DATP in 2017, including deployments within two of the largest freight trucking fleets in the United States. Further detail on DATP can be found in our original submitted comment. This inflection point from pilot to commercial use of DSRC is now being reached, reflecting the culmination of years of significant investments by our company and others, including OEMs, suppliers, and system developers across the transportation industry.

Dedicated Channels and Safety-of-Life Applications

A number of comments, including those by the National Cable & Telecommunications Association and the Public Interest Spectrum Coalition, argue that only a portion of the current 7-channel DSRC spectrum is necessary for safety-of-life applications. The NTCA comments include a section entitled “30 Megahertz of Spectrum is More Than Sufficient for Crash



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Avoidance and 'Safety-Adjacent' DSRC Applications," while the Public Interest Spectrum Coalition asserts, "By dedicating three channels exclusively to DSRC safety applications – including the dedicated 10 megahertz BSM channel needed to implement DOT's proposed V2V mandate – the Qualcomm proposal virtually eliminates the risk of interference with safety-of-life applications...." Peloton Technology disagrees with these assertions. Rather, we share the understanding of the American Association of State Highway & Transportation Officials (AASHTO) that, "with few exceptions, there is no 'Bright Line' between safety and non-safety messages." Our position is that all seven channels of DSRC safety messaging in currently conceptualized and future emerging applications, including those that may not strictly be considered "safety-of-life" applications, are key to realizing the life-saving potential of DSRC. Our DATP system is a strong example of such applications, in that it applies clear, reliable, low-latency V2V DSRC to ensure the safety of trucks traveling in platoon. Importantly, we see future innovations within our company and elsewhere in the industry as likely to *increase*, not decrease demand for DSRC bandwidth, including for safety-critical DSRC messaging.

Thank you for the opportunity offered by the Commission to respond to comments on potential sharing solutions in the 5.850-5.925 GHz band.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Boyd'.

Steve Boyd
Co-Founder & VP External Affairs
Peloton Technology, Inc.